



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

February 25, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Judge
United States District Court
500 Pearl St.
New York, New York 10007

Re: *Hong v. Noem*,¹ et al., No. 24 Civ. 9965 (LJL)

Dear Judge Liman:


This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to process his application for an immigration benefit (Form I-589). On behalf of the government, I write respectfully to request an adjournment of the initial pretrial conference scheduled for March 6, 2025, at 12:00 p.m., and a corresponding extension of deadline to file the proposed Case Management Plan and Scheduling Order, currently due by February 27, 2025, to a date and time after April 7, 2025, that is convenient to the Court and the parties.

I respectfully request this extension because I am still in the process of gathering information from USCIS about the plaintiff’s Form I-589. This is the government’s first request for an extension of the deadline to respond to the complaint. Plaintiff consents to this request.

In addition, the government’s response to the complaint is currently due on March 10, 2025. I expect to have gathered sufficient information before that date to inform the Court and opposing counsel whether the government intends to move to dismiss the complaint.

The initial pretrial conference scheduled for March 6, 2025 is adjourned to April 9, 2025 at 3 PM.

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

February 28, 2025

¹ Pursuant to Fed. R. Civ. P. 25(d), Secretary of Homeland Security Kristi Noem is substituted in place of Alejandro Mayorkas.

I thank the Court for its consideration of this request.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: s/ Leslie A. Ramirez-Fisher
LESLIE A. RAMIREZ-FISHER
Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Telephone: (212) 637-0378
E-mail: leslie.ramirez-fisher@usdoj.gov
Attorney for Defendants

cc: Counsel of record (via ECF)